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To: Al Howard, MDEQ
George Carpenter, MDEQ
Fax #: 517-373-2637
517-335-4887

Date: May 29, 1997
Pages: 6, including this
cover sheet.

From: Mark P. Brown, Ph.D.

Subject: 645.24 #2

COMMENTS:

Thought you would be interested in the attached letters.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 27 RECD

ATTN: DAN
SPAVLAND
5 PAGES
MAY 20 1997

REPLY TO THE ATTENTION OF

R-19J

Honorable Fred Upton
157 South Kalamazoo Mall
Mall Plaza, Suite 180
Kalamazoo, MI 49007

Dear Congressman Upton:

This is in response to your letter dated April 30, 1997. I share your concern about the polychlorinated biphenyl (PCB) contamination at the Bryant Mill Pond. As summarized in the attached letter to Mr. Robert G. Beck of the Kalamazoo River Area of Concern Public Advisory Council, the Bryant Mill Pond is part of the Allied Paper/Portage Creek/Kalamazoo River Superfund Site (Site). An investigation of this Site is being conducted by a group of Paper Companies under an agreement with the State of Michigan. The State of Michigan is also involved in discussions of remedial actions at the Site with the Paper Companies.

During the week of May 5, an On-Scene Coordinator from our Agency gathered available data, visited the Bryant Mill Pond, and collected sediment samples to confirm that present PCB concentrations are consistent with historical data. The Michigan Department of Environmental Quality cooperated in the data gathering effort. A report, called a Removal Assessment Report, on this initial assessment is expected to be completed and available to the public by the end of June 1997. This report will contain the results of the sampling, an evaluation of threats posed by the contamination, an evaluation of potential response actions, a recommended response action, and a time-line for future actions. Future actions recommended in the Removal Assessment Report may include implementing immediate containment measures, completing a more detailed evaluation of alternatives (called an Engineering Evaluation/Cost Assessment or EE/CA) for an interim action, or taking no interim action.

Following completion of the evaluation of alternatives in the Removal Assessment or, if necessary, the EE/CA, our Agency will decide which alternative (if any) should be implemented, and will enter negotiations with HM Holdings, Inc., the successor corporation to Allied Paper, for design and implementation of the selected alternative. If negotiations are unsuccessful, then we may implement a federally funded action. For expedited response actions, we normally allow no more than a couple of months for negotiations. We will work with the State of Michigan in evaluating what action should be taken and in implementing any actions.

KB11901887

2

If you have any further questions regarding this matter, please do not hesitate to contact me.

Sincerely yours,



Valdas V. Adamkus
Regional Administrator

KB11901888

3

cc: R. Harding, Director MDEQ
S. Cornelius, MDEQ
M. Powers, Kalamazoo County
R. Beck, Kalamazoo River Area of Concern Public Advisory Council
Senator Carl Levin
Senator Spencer Abraham
Senator Dale Shugars
Representative Donald Gilmer
Representative Ed La Forge
Representative Charles Perricone

KB11901889



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 24 1997

REPLY TO THE ATTENTION OF:

S-6J

Robert G. Beck, Chairman
Kalamazoo River Area of Concern Public Advisory Council
8135 Cox's Driver, Suite 106
Portage, MI 49002-5879

Dear Mr. Beck:

I am responding to your letter dated March 25, 1997 on behalf of Valdas V. Adamkus, Regional Administrator for the United States Environmental Protection Agency (U.S. EPA). In your letter, the Kalamazoo River Area of Concern Public Advisory Council petitions the U.S. EPA and the State of Michigan to implement "emergency cleanup measures to stop continuous release and migration of PCBs from the Bryant Millpond to the Portage Creek and the Kalamazoo River". U.S. EPA shares your concern about the continuing release of polychlorinated biphenyls (PCBs) from the Bryant Millpond. In addition, U.S. EPA is concerned about the human health and environmental risks presented by the PCB contamination at Bryant Millpond, as well as the PCB contamination in other impoundment areas along the Kalamazoo River.

The Bryant Millpond is presently being addressed as part of the Allied Paper/Portage Creek/Kalamazoo River Superfund site. The Superfund program was established by the Congress of the United States to address the worst hazardous waste sites in the nation. U.S. EPA has delegated the lead for implementation of actions for this site to the Michigan Department of Environmental Quality (MDEQ), under an agreement between the two Agencies. Under this agreement, U.S. EPA is providing funding to MDEQ to conduct a risk assessment at the site. U.S. EPA also provides technical support to MDEQ, conducts limited oversight, and provides approval for any final remedial actions.

Congress has appropriated federal funds for taking actions at Superfund sites, but federal funds are limited. Furthermore, U.S. EPA prefers to have the polluter pay for or implement the remedial actions. Therefore, MDEQ is working to implement actions at the site through a group of paper companies. MDEQ has succeeded in securing an agreement with a group of paper companies, whose discharges caused the contamination, to conduct an investigation of the extent and nature of contamination at the site, and to evaluate alternative remedial actions. One of these paper companies is HM Holdings, Inc., the successor to the Allied Paper Company, which was the source of PCB contamination at Bryant Millpond.

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2

The investigation has determined that PCBs are the contaminant of primary concern and that this contamination was generated from the recycling of carbonless copy paper between 1957 and the 1970s. Allied Paper disposed of some paper residuals in landfills next to Portage Creek, but some of the residuals have flowed into Portage Creek and caused the contamination at the Bryant Millpond and also contributed to the contamination of sediments in downstream areas of Portage Creek and the Kalamazoo River. It should be emphasized that PCBs are no longer being discharged by Allied Paper, and that the Allied Paper landfills along Portage Creek are no longer in active operation. The sediments in Bryant Millpond have the highest PCB concentrations of all the impounded areas along the Kalamazoo River system and presents a substantial risk to wildlife in the area. Any erosion of the contaminated sediments will cause migration of PCB contamination downstream. However, the sediments are stabilized to some degree by vegetative growth, and the surficial sediments have a lower concentration than the deeper sediments.

MDEQ is presently in negotiations with the paper companies, including HM Holdings, Inc. to accelerate actions to improve containment of PCB wastes that are presently in landfills along Portage Creek and the Kalamazoo River. Such action will likely include excavation of nearby sediments associated with the landfills and containment of these contaminated sediments on the landfills. This possibility is being considered for the Bryant Millpond sediments. Please be assured that U.S. EPA is committed to supporting MDEQ in its effort to address the site expeditiously. MDEQ projects that the investigation will be complete and a remedial action will be selected for the Allied Paper landfills and the Bryant Mill Pond area during 1998. Following selection of the remedial action, MDEQ plans to negotiate with HM Holdings, Inc., and the other paper companies for design and implementation of the selected remedial action.

Both MDEQ and U.S. EPA have contemplated taking a short-term action to address the Bryant Millpond. In response to your petition, U.S. EPA will more formally evaluate the potential effectiveness and estimated costs of taking a short-term action to remove or better stabilize contamination at Bryant Millpond. This review will be conducted over the next three months, and we will report the results to your organization.

If you have any further questions, feel free to contact Rich Boice, the assigned Remedial Project Manager for this site, at (312) 886-4740.

Sincerely yours,

WILLIAM E. MUNO
DIRECTOR

William E. Munro, Director
Superfund Division

KB11901891

TOTAL P.05

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